

**LAW OFFICES OF
MICHAEL K. CHONG LLC**

**2 EXECUTIVE DRIVE, STE. 720
FORT LEE, NEW JERSEY 07024
(201) 708-6675 FAX (201) 708-6676**

EMAIL: MKCHONG@MKCLAWGROUP.COM

MICHAEL K. CHONG ‡

**‡ MEMBER, NJ BAR, U.S.D.C. NEW JERSEY
SDNY, NEW YORK
EDNY, NEW YORK**

NEW YORK:

**1250 BROADWAY 36TH FL. STE. 300
NEW YORK, NEW YORK 10001
(212) 726-1104 FAX (212) 726-3104**

HOBOKEN:

**300 HUDSON STREET STE. 10
HOBOKEN, NEW JERSEY 07030
(201) 203-7476 FAX (201) 708-6676**

** Please Reply to: Fort Lee*

August 17, 2015

Via ECF

Hon. Steven I. Locke, U.S.M.J.
Courtroom 820
100 Federal Plaza
Central Islip, NY 11722
Englewood, NJ 07631

Re: Siancas et al. v. Exclusive Detailing Inc. et al.
Docket No.: 2:14-cv-6151

Dear Judge Locke:

This office represents defendant Exclusive Detailing Inc. ("EDI") in regard to the above referenced matter. Plaintiff seeks to depose a person from EDI who prepared the employee list, and submitting a follow up list a few days later, which Plaintiff's counsel now questions. According to Your Honor's order dated July 23, 2015, and our follow up phone discussion concerning the scheduling of this deposition, the parties have until August 31, 2015 to complete this deposition.

I submit the following as an update to my August 11, 2015 letter to Your Honor. Plaintiff's counsel has finally agreed to take the deposition of Carl De Almeida, the person from EDI who actually prepared the employee list, rather than Michael Agoila who has no knowledge of the preparation of the list or the follow up list submitted.

Mr. Almeida is no longer available and is in Portugal taking care of his parents, and will not be available to mid-September. As such, an extension of time to complete Mr. Almeida's deposition is requested, to the end of September.

Thank you for your attention and courtesies as to this matter.

Respectfully submitted,

Michael K. Chong

Michael K. Chong, Esq.

MKC/

cc: Steven Moser, Esq. (Plaintiff's counsel)
Melissa Stannard, Esq. (Co-Defendants' counsel)
James McGrath, Esq. (Co-Defendants' counsel)